Message

From: Smith, Patricia [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP

(FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=62ED1D626C8749A9A18584AAD8854EAC-SMITH, PATRICIA]

Sent: 3/7/2017 6:21:52 PM

To: Gallo, Patty (CONTR) [Patty.Gallo@Im.doe.gov]; 'Carl Spreng (carl.spreng@state.co.us)' (carl.spreng@state.co.us)

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[Moritz.Vera@epa.gov]; Surovchak, Scott [Scott.Surovchak@lm.doe.gov]

CC: Kaiser, Linda (CONTR) [Linda.Kaiser@lm.doe.gov]; Ward, David (CONTR) [David.Ward@lm.doe.gov]; Smith, Patricia

[Smith.Patricia@epa.gov]

Subject: RE: Protectiveness statement for Rocky Flats FYR

Attachments: PS Mar 2017.docx

My recommendation for revising the text below is attached. It is more specific about your remedial actions, and you'll see a slightly stronger connection to objectives in the RAO summary table. I recommend leading with source controls, not ICs.

Pat Smith, RPM EPA Region 8 303-312-6504

From: Gallo, Patty (CONTR) [mailto:Patty.Gallo@lm.doe.gov]

Sent: Monday, March 06, 2017 11:23 AM

To: 'Carl Spreng (carl.spreng@state.co.us)' (carl.spreng@state.co.us) <carl.spreng@state.co.us>; lindsay.masters@state.co.us; Murl, Jeffrey <Jeffrey.Murl@lm.doe.gov>; Moritz, Vera <Moritz.Vera@epa.gov>;

Surovchak, Scott <Scott.Surovchak@lm.doe.gov>; Smith, Patricia <Smith.Patricia@epa.gov>

Cc: Kaiser, Linda (CONTR) <Linda.Kaiser@lm.doe.gov>; Ward, David (CONTR) <David.Ward@lm.doe.gov>

Subject: Protectiveness statement for Rocky Flats FYR

All:

As a result of discussions in the last FYR Team meeting, I revised the protectiveness statement (below). Feel free to make any changes or add comments directly in this email and send back to me <u>no later than this Wednesday, March 8</u>, if possible.

I've also attached Appendix F, *Documents Reviewed*, which is a simple list of documents reviewed for this FYR. I used the 2001 EPA guidance document to decide which documents should be included in the list. Feel free to comment on this Appendix as well.

The remedy at the COU is protective of human health and the environment. Institutional controls are in place and effective in preventing unacceptable exposures by prohibiting building construction, controlling intrusive activities, restricting use of groundwater and surface water, and protecting engineered remedy components. Physical controls are in place and effective at controlling site access. Surface and groundwater monitoring provides assurance that water quality at the COU boundary is protective. Routine inspections of engineered remedy components ensure that remedy maintenance and repairs are identified and implemented in a timely manner. Groundwater treatment systems continue to reduce contaminant load to surface water. Optimization of groundwater treatment systems is occurring to further reduce contaminant concentrations entering surface water.

In accordance with EPA guidance, because Rocky Flats is a construction complete site, a site-wide protectiveness statement is also required in the FYR report. Because the remedial actions at all OUs associated with the Rocky Flats site (COU, POU, and OU3) are protective, the site is protective of human

health and the environment. The remedy in place at the COU is protective and the POU and OU3 continue to meet the conditions for UU/UE.

P.S. I will be forwarding the revised Question B section and Appendix C, Risk Review (with tracked changes) for your review either later today or tomorrow.



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